

**CIVIL COVER SHEET**

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM).

**I. (a) PLAINTIFFS****UNITED STATES OF AMERICA**

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

**DEFENDANTS****FRAME Q, L.L.C.**

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

**BERGEN**

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)  
Jordan M. Anger, AUSA  
United States Attorney's Office  
970 Broad St., Room 700  
Newark, New Jersey 07102  
(973)645-2829

ATTORNEYS (IF KNOWN)

**II. BASIS OF JURISDICTION** (PLACE "X" IN ONE BOX ONLY)

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> 1 U.S. Government Plaintiff | <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)          |
| <input type="checkbox"/> 2 U.S. Government Defendant            | <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in item III) |

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (PLACE AN "X" IN ONE BOX FOR DIVERSITY CASES ONLY)

	PTF	DEF	PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6

**IV. CAUSE OF ACTION** (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)  
28 U.S.C. § 1345 - United States as Plaintiff**V. NATURE OF SUIT** (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment at Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input checked="" type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury Med. Malpractice <input type="checkbox"/> 365 Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Prod. Liab.	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure at Property 21 U.S.C. 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 U.S.C. 158 <input type="checkbox"/> 423 Withdrawal 28 U.S.C. 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
<b>REAL PROPERTY</b>	<b>CIVIL RIGHTS</b>	<b>PRISONER PETITION</b>	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung(923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
			<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 U.S.C. 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/ Commodities/ Exchange <input type="checkbox"/> 875 Customer Challenge 12 U.S.C. 3140 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determ. Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions

**VI. ORIGIN**  
 1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judgment**VII. REQUESTED IN COMPLAINT:**CHECK IF THIS IS A CLASS ACTION  
 UNDER F.R.C.P. 23**DEMAND \$**

CHECK YES only if demanded in complaint:

**JURY DEMAND:**  YES  NO**VII. RELATED CASE(S)** (See instructions:  
IF ANY)

DATE

SIGNATURE OF ATTORNEY OF RECORD

Jordan M. Anger, Assistant United States Attorney

CRAIG CARPENITO  
United States Attorney  
JORDAN M. ANGER  
Assistant U.S. Attorney  
970 Broad Street, Room 700  
Newark, NJ 07102  
Tel. 973-645-2829  
Fax. 973-645-3210  
Email: jordan.anger@usdoj.gov  
(FLU:YH)

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA, : **HON.**  
: *Civil Action No.*  
*Plaintiff,* : **COMPLAINT**  
v. :  
FRAME Q, L.L.C., :  
: *Defendant.*

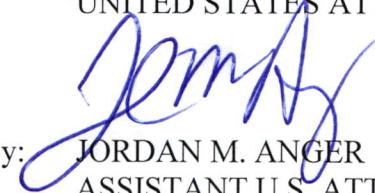
CRAIG CARPENITO, United States Attorney for the District of New Jersey, on behalf of plaintiff, United States of America, for its Complaint against defendant, FRAME Q, L.L.C. , says that:

1. This is a civil action brought on behalf of the United States of America and this Court has jurisdiction under the provisions of 28 U.S.C. Section 1345.
2. The defendant resides in Palisades Park, within the state and district of New Jersey.
3. Defendant owes plaintiff the principal sum of \$473,178.00, as more fully set forth on the Certificates of Indebtedness attached hereto as Exhibit "A - H".
4. Due demand has been made for payment.

THEREFORE, plaintiff demands judgment against defendant as follows:

- a. In the amount of \$678,503.01 (\$473,178.00.00 principal, \$4,918.68 interest accrued through December 13, 2018), \$27,146.16 penalties, \$160.00 administrative fees, and \$173,100.17 Treasury & DOJ fees;
- b. Interest to accrue at the rate of 1.000% per annum from December 13, 2018 to date of judgment;
- c. Interest from the date of judgment at the legal rate in effect on the date of judgment until paid in full;
- d. Costs of suit; and
- e. For such other relief as this Court may deem just.

CRAIG CARPENITO  
UNITED STATES ATTORNEY

By:   
JORDAN M. ANGER  
ASSISTANT U.S. ATTORNEY



DEPARTMENT OF THE TREASURY  
BUREAU OF THE FISCAL SERVICE  
WASHINGTON, DC 20227

ACTING ON BEHALF OF  
U.S. DEPARTMENT OF LABOR  
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and  
Address (es):

Frame Q, L.L.C.  
200B Commercial Ave.  
Palisades Park, NJ 07650

Treasury Claim No. TRFM26802115

Total debt due United States as of December 13, 2018:

Principal: \$25,080.00

Interest (@1.0%): \$ 814.13

Penalty (@6.0%): \$ 4,759.36

Admin.: \$ 20.00

Treasury & DOJ fees: \$11,067.76

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), and 28 U.S.C. 527)

**TOTAL: \$41,741.25**

I certify that the U. S. Department of Labor, Occupational Safety and Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated above.

The claim arose in connection with three workplace safety violation under the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, et seq. and OSHA regulations at 29 C.F.R. 1926 as noted during a June 8, 2015 OSHA inspection of debtor's 462 2<sup>nd</sup> Street, Palisades Park, New Jersey work-site.

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U. S. Department of Labor, Occupational Safety and Health Administration.

Date: 12/13/2018

A handwritten signature in black ink, appearing to read "Regina Crisafulli".

Regina Crisafulli  
Financial Program Specialist  
U.S. Department of the Treasury  
Bureau of the Fiscal Service



DEPARTMENT OF THE TREASURY  
BUREAU OF THE FISCAL SERVICE  
WASHINGTON, DC 20227

ACTING ON BEHALF OF  
U.S. DEPARTMENT OF LABOR  
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and  
Address (es):

Frame Q, L.L.C.  
200B Commercial Ave.  
Palisades Park, NJ 07650

Treasury Claim No. TRFM26802111

Total debt due United States as of December 13, 2018:

Principal: \$4,400.00

Interest (@1.0%): \$ 32.83

Penalty (@6.0%): \$ 174.98

Admin.: \$ 20.00

Treasury & DOJ fees: \$1,574.41

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), and 28 U.S.C. 527)

TOTAL: \$6,202.22

I certify that the U. S. Department of Labor, Occupational Safety and Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated above.

The claim arose in connection with two workplace safety violation under the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, et seq. and OSHA regulations at 29 C.F.R. 1926 as noted during a January 23, 2015 OSHA inspection of debtor's Sherwood Drive work-site, in Paramus, New Jersey.

CERTIFICATION: Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U. S. Department of Labor, Occupational Safety and Health Administration.

Date: 12/13/2018

A handwritten signature in black ink, appearing to read "Regina Crisafulli".

Regina Crisafulli  
Financial Program Specialist  
U.S. Department of the Treasury  
Bureau of the Fiscal Service



DEPARTMENT OF THE TREASURY  
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WASHINGTON, DC 20227

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OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and  
Address (es):

Frame Q, L.L.C.  
200B Commercial Ave.  
Palisades Park, NJ 07650

Treasury Claim No. TRFM26603897

Total debt due United States as of December 13, 2018:

Principal: \$222,697.00

Interest (@1.0%): \$ 1,567.53

Penalty (@6.0%): \$ 8,291.65

Admin.: \$ 20.00

Treasury & DOJ fees: \$ 79,123.85

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), and 28 U.S.C. 527)

TOTAL: \$311,700.03

I certify that the U. S. Department of Labor, Occupational Safety and Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated above.

The claim arose in connection with two workplace safety violation under the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, et seq. and OSHA regulations at 29 C.F.R. 1926 as noted during an April 21, 2016 OSHA inspection of debtor's 119 Abbott Ave., Palisades Park,, New Jersey Work-site.

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U. S. Department of Labor, Occupational Safety and Health Administration.

Date: 12/13/2018

A handwritten signature in black ink, appearing to read "Regina Crisafulli".

Regina Crisafulli  
Financial Program Specialist  
U.S. Department of the Treasury  
Bureau of the Fiscal Service



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WASHINGTON, DC 20227

ACTING ON BEHALF OF  
U.S. DEPARTMENT OF LABOR  
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and  
Address (es):

Frame Q, L.L.C.  
200B Commercial Ave.  
Palisades Park, NJ 07650

Treasury Claim No. TRFM26802165

Total debt due United States as of December 13, 2018:

Principal: \$153,241.00

Interest (@1.0%): \$ 1,398.76

Penalty (@6.0%): \$ 7,626.36

Admin.: \$ 20.00

Treasury & DOJ fees: \$ 55,210.75

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), and 28 U.S.C. 527)

**TOTAL: \$217,496.87**

I certify that the U. S. Department of Labor, Occupational Safety and Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated above.

The claim arose in connection with four workplace safety violation under the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, et seq. and OSHA regulations at 29 C.F.R. 1926 as noted during an April 3, 2017 OSHA inspection of debtor's 2465 6<sup>th</sup> Street, Fort Lee, New Jersey Work-site.

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U. S. Department of Labor, Occupational Safety and Health Administration.

Date: 12/13/2018

A handwritten signature in black ink, appearing to read "R. Crisafulli".

Regina Crisafulli  
Financial Program Specialist  
U.S. Department of the Treasury  
Bureau of the Fiscal Service



DEPARTMENT OF THE TREASURY  
BUREAU OF THE FISCAL SERVICE  
WASHINGTON, DC 20227

ACTING ON BEHALF OF  
U.S. DEPARTMENT OF LABOR  
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and  
Address (es):

Frame Q, L.L.C.  
200B Commercial Ave.  
Palisades Park, NJ 07650

Treasury Claim No. TRFM26802113

Total debt due United States as of December 13, 2018:

Principal: \$13,640.00

Interest (@1.0%): \$ 101.77

Penalty (@6.0%): \$ 542.42

Admin.: \$ 20.00

Treasury & DOJ fees: \$ 4,866.38

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), and 28 U.S.C. 527)

TOTAL: \$19,170.57

I certify that the U. S. Department of Labor, Occupational Safety and Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated above.

The claim arose in connection with three workplace safety violation under the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, et seq. and OSHA regulations at 29 C.F.R. 1926 as noted during an April 22, 2015 OSHA inspection of debtor's Abbott Boulevard work-site, in Fort Lee, New Jersey.

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U. S. Department of Labor, Occupational Safety and Health Administration.

Date: 12/13/2018

A handwritten signature in black ink, appearing to read "Regina Crisafulli".

Regina Crisafulli  
Financial Program Specialist  
U.S. Department of the Treasury  
Bureau of the Fiscal Service



DEPARTMENT OF THE TREASURY  
BUREAU OF THE FISCAL SERVICE  
WASHINGTON, DC 20227

ACTING ON BEHALF OF  
U.S. DEPARTMENT OF LABOR  
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and

Address (es):

Frame Q, L.L.C.  
200B Commercial Ave.  
Palisades Park, NJ 07650

Treasury Claim No. TRFM26802273

**Total debt due United States as of December 13, 2018:**

**Principal: \$14,520.00**

**Interest (@1.0%): \$ 156.74**

**Penalty (@6.0%): \$ 867.82**

**Admin.: \$ 20.00**

**Treasury & DOJ fees: \$ 5,295.16**

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), and 28 U.S.C. 527)

**TOTAL: \$20,859.72**

I certify that the U. S. Department of Labor, Occupational Safety and Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated above.

The claim arose in connection with five workplace safety violation under the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, et seq. and OSHA regulations at 29 C.F.R. 1926 as noted during a March 3, 2014 OSHA inspection of debtor's 18 Skyline Drive, Engelwood Cliff, New Jersey work-site.

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U. S. Department of Labor, Occupational Safety and Health Administration.

Date: 12/13/18

Regina Crisafulli  
Financial Program Specialist  
U.S. Department of the Treasury  
Bureau of the Fiscal Service



DEPARTMENT OF THE TREASURY  
BUREAU OF THE FISCAL SERVICE  
WASHINGTON, DC 20227

ACTING ON BEHALF OF  
U.S. DEPARTMENT OF LABOR  
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and  
Address (es):

Frame Q, L.L.C.  
200B Commercial Ave.  
Palisades Park, NJ 07650

Treasury Claim No. TRFM26802107

Total debt due United States as of December 13, 2018:

Principal: \$20,680.00

Interest (@1.0%): \$ 705.76

Penalty (@6.0%): \$ 4,131.18

Admin.: \$ 20.00

Treasury & DOJ fees: \$ 9,214.36

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), and 28 U.S.C. 527)

**TOTAL: \$34,751.30**

I certify that the U. S. Department of Labor, Occupational Safety and Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated above.

The claim arose in connection with three workplace safety violation under the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, et seq. and OSHA regulations at 29 C.F.R. 1926 as noted during a February 24, 2015 OSHA inspection of debtor's 27 Maple Ave., Mahwah, New Jersey work-site.

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U. S. Department of Labor, Occupational Safety and Health Administration.

Date: 12/13/2018

A handwritten signature in black ink, appearing to read "R. Crisafulli".

Regina Crisafulli  
Financial Program Specialist  
U.S. Department of the Treasury  
Bureau of the Fiscal Service



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BUREAU OF THE FISCAL SERVICE  
WASHINGTON, DC 20227

ACTING ON BEHALF OF  
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OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
CERTIFICATE OF INDEBTEDNESS

Debtor Name(s) and

Address (es):

Frame Q, L.L.C.  
200B Commercial Ave.  
Palisades Park, NJ 07650

Treasury Claim No. TRFM26802117

**Total debt due United States as of December 13, 2018:**

**Principal: \$18,920.00**

**Interest (@1.0%): \$ 141.16**

**Penalty (@6.0%): \$ 752.39**

**Admin.: \$ 20.00**

**Treasury & DOJ fees: \$ 6,747.50**

(pursuant to 31 U.S.C. 3717(e) and 3711(g)(6), and 28 U.S.C. 527)

**TOTAL: \$26,581.05**

I certify that the U. S. Department of Labor, Occupational Safety and Health Administration (OSHA) records show that the debtor named above is indebted to the United States in the amount stated above.

The claim arose in connection with two workplace safety violation under the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, et seq. and OSHA regulations at 29 C.F.R. 1926 as noted during a December 22, 2015 OSHA inspection of debtor's 1010/1006 Morningside Lane, Fort Lee, New Jersey Work-site..

**CERTIFICATION:** Pursuant to 28 USC ss. 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief based upon information provided by the U. S. Department of Labor, Occupational Safety and Health Administration.

Date: 12/13/2018

A handwritten signature in black ink, appearing to read "Regina Crisafulli".

Regina Crisafulli  
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Bureau of the Fiscal Service